

Dear FCC,

My name is Tom Bunch. I am an artist manager and a music concert promoter. My management company, TAB Management, is based in Venice, CA, and my concert promotion company, TAB Tours Inc., is based in New Orleans, LA. I am incredibly excited about your proposal to license new low power radio stations. Below are my thoughts on how I (along with a few business associates and investors) would like to use the proposed LPFM stations.

The big loser in consolidation is Rock Radio which has been a staple of American entertainment and advertising since the early '70's. After consolidation there is no longer strong competition or a connection to the community (with DJ's playing a smaller and smaller role in the programming and personality of Radio stations). Consolidation has reduced the amount of exposure to diverse types of Music and entertainment and has placed the decision making process of what is heard by the public into the hands of a very few Radio programmers and consultants. In most major cities during the '70's, '80's & '90's there were 2 Rock Radio stations in each of the major and middle sized markets in the U.S. There was fierce competition between the 2 stations for advertising dollars, concert promotions, record label promotions, movie promotions, and local community promotions. When the FCC deregulated FM Radio major companies (SFX, Jacor, Clearcom, etc.) bought 3 or 4 stations in the same market and split Rock Radio into Modern Rock, AAA, & Classic Rock. Their question was why own 1 Rock station in a market when you can own 3 or 4. The real answer is that there is not enough good Music to program 3 different Rock formats. With corporate ownership you lose the connection to the community and you lose competition (the energy that kept Rock Radio vibrant, creative and alive).

What I am proposing will put Rock Radio back into the picture as a creative, profitable, efficient way to advertise, express community views, and live a fun life full of Music and entertainment. My proposal provides a voice to the local community and a forum for local, national, & international musicians as well as a place for local, regional, & national companies to advertise inexpensively to a focused target audience. The way I see these LPFM Rock stations working best is for them to become an amalgamation of 3 Radio styles:

- 1) 1/3 Old School Free Form FM Radio
- 2) 1/3 Listener Sponsored Community Oriented Radio
- 3) 1/3 Commercial Radio

Old School Free Form FM Radio - where the play list is a Top 65 instead of Top 30 or Top 40; where old and new music is played side by side; where album tracks are played along with the single; where the DJ has a personality and a say in what gets played; where a station that has strong roots in the local community with many listeners providing events and advertisers

Listener Sponsored Community Oriented Radio - stations with local community members presenting specialty shows at night and on weekends that are sponsored by local businesses; stations that showcase specialized types of music that the DJ has an expertise in (usually connected with his/her day job: DJ at a local club, Record store

or Restaurant owner, local musician, local newspaper columnist, etc.)

Commercial Radio - stations that sell local and national advertising

The key to these LPFM Rock stations is to own 5 to 10 stations limited to 1 station per market in a middle or large market. With ownership of 5 to 10 stations it will be possible to attract national advertisers (i.e. major Record labels, Movie companies, Beer & Soda companies, Car Manufacturers, etc.).

These national companies will buy LPFM Rock advertisements if they can purchase spots on 10 LPFM stations that reach the same amount of people as 3 large Rock stations given that they can make their purchase through one representative for all 10 LPFM stations. The lower overhead and smaller out-of-pocket costs required to run the LPFM stations will generate very competitive Ad rates for national advertisers while making it possible to offer local businesses (Car Dealerships, Restaurants, Clubs, Retail Shops, Hair Salons, TV Stations, etc.) very reasonable rates.

National advertisers including major Record labels, Movie companies, Beer & Soda companies, Car Manufacturers, etc. will make these LPFM Rock stations usable for the large promotions surrounding Record and Movie releases. This will allow for tie-ins with local businesses to support new Music artists, new Movies, and new products. Local advertisers will be very happy with the national tie-ins. They will increase the local advertisers' profile as well as connect them with large national brands. National advertisers will be pleased to have such a focused and inexpensive way to reach a target audience.

For an audience of males and females ages 18 - 35, the specialty shows can target as follows:

- Males & Females 18 - 25
 - > New Music
- Males & Females 25 - 50
 - > Classic Rock
 - > Reissue LP's
 - > Grateful Dead

The idea is to make the spectrum of ages reached a wide range (i.e. 16 - 50). We need stations where a 40+ Father and his 18 year old son can both find something to listen to and enjoy.

In corporate American Radio after consolidation the needs of profit outweigh the needs of the community. With LPFM Rock Radio as I have proposed it the needs of the community will work hand in hand with the needs of profit. This will promote additional diversity in Radio voices and program services and will provide an opportunity for individual citizens and small groups of citizens to operate Radio. It will allow people of limited financial means to have a voice in American Radio. I expect that all 10 stations could be constructed for less than purchasing 1 station in a middle to large market.

For my proposal a 3,000 watt station class would be better suited to

national and local advertisers. The increased coverage would make it a more lucrative business proposition. It would also make it possible to reach more people in their automobiles.

Please respond.